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March 20, 2018

Via ECF

The Honorable Steven C. Mannion, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King, Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *White, et al. v. LG Electronics, Inc., et al.*
Civil Action No. 17-1775 (MCA)(SCM)

Dear Magistrate Judge Mannion:

We, along with Latham & Watkins LLP, represent Defendant LG Electronics U.S.A., Inc. ("LG"), and write on behalf of LG, Sony Electronics Inc., and Samsung Electronics America, Inc. (collectively, "Defendants"), concerning the letter from Plaintiffs' counsel [D.E. 58], purporting to seek "clarification" from the Court as to whether discovery may proceed while Defendants' motion to dismiss is pending. Plaintiffs claim this would facilitate discussions concerning the Joint Discovery Plan, which is due today.

Plaintiffs' counsel, however, has repeatedly frustrated Defendants' efforts to meet and confer with him concerning the Joint Discovery Plan, despite the requirements of Rule 26(f), L. Civ. R. 26.1, and Your Honor's Order Scheduling R. 16 Conference [D.E. 51]. Nonetheless, Defendants intend to file today their proposed Discovery Plan, which addresses in detail Defendants' position on discovery scheduling, as well as discovery-related concerns particular to this case. We respectfully request that the Court address all such issues, including the one raised by Mr. Press, at the Rule 16 conference on March 28, 2018, so that all counsel may be fully heard on the matter.

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Respectfully submitted,

/s/ Jeffrey J. Greenbaum

JEFFREY J. GREENBAUM

cc: Hon. Madeline Cox Arleo, U.S.D.J. (via ECF)
All counsel of record (via ECF)